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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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April 26, 2004

Mr. Keith A. Klein, Manager
Richland Operation Office
United States Department of Energy
P. O. Box 550, MSIN: A7-50
Richland, Washington 99352

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EDMC

Dear Mr. Klein:

Re: Burial Ground Sampling and Analysis Results for October - December 2003

The Washington State Department of Ecology (Ecology) is in receipt of the "Burial Ground Sampling and Analysis Results for October - December 2003" (Report), dated March 17, 2004, and submitted by the United States Department of Energy, Richland Operations Office, in response to Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Settlement and Tentative Agreement Interim Milestone M-91-40, requirement 2, paragraph 3. 61477

Ecology has completed its review of the 218-W-4C Sampling and Analysis Results Report and finds:

- In Section 3.0, it was noted that the gas chromatograph (GC) results on October 21, 2003, and subsequent days, were unrepresentative due to a lamp that was potentially unreliable. This was shown by concentrations that were too low. Upon review of the data in Table 3, this is very evident. The Innova data for carbon tetrachloride and chloroform was consistently higher in concentration for these samples than the GC results. However, there is no information or data qualifiers included within the data table that would indicate what had occurred, or that the GC data for those dates is unusable. All GC data for the eight tested volatile organic compounds (VOC) should be noted with "unusable" or a similar qualifier.
- In Section 4.0, second to the last paragraph, it was reported that the holding time was exceeded for one duplicate sample. However, which duplicate is not specified either in the text or within the data table. This should be specified, and the duplicate result should be listed as "unusable" or "invalid".



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Page 2

Ecology recommends these changes be incorporated in the Report and resubmitted to Ecology as final.

Sincerely,



Fred C. Jamison
Waste Management Project Manager
Nuclear Waste Program

FCJ:nc

cc: Todd Martin, HAB
Stuart Harris, CTUIR
Pat Sobotta, NPT
Russell Jim, YN
Ken Niles, ODOE
Environmental Portal
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